



# Brotherhood of Locomotive Engineers and Trainmen

*A Division of the Rail Conference-International Brotherhood of Teamsters*

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**RAYMOND A. HOLMES**  
Vice President &  
National Legislative Representative

28 3577

June 10, 2004

Docket Clerk, DOT Central Docket  
Management Facility, Room PL-401  
400 7th Street, SW.  
Washington, DC 20590-0001

Re: Docket No. FRA-2004-17444 - 4

Dear Docket Clerk:

The Canadian National-Illinois Central Railroad (CN-IC) seeks approval of the proposed discontinuance and removal of the automatic block signal system on the single main track between milepost 394.7 and milepost 397.5 on the Memphis Subdivision and, between milepost 397.5 and milepost 398.2 on the Grenada Subdivision, Gulf Division, near Memphis, Tennessee. The request for discontinuance and removal of the automatic block signal system is apparently justified on the premise that operation of train movements are under the direction of the Memphis Yardmaster.

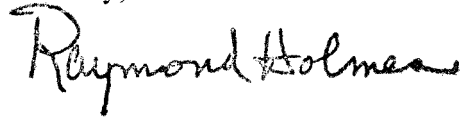
The Brotherhood of Locomotive Engineers and Trainmen (BLET), representing the locomotive engineers operating on these tracks, requests the discontinuance be denied for the following reasons:

- There are two forms of protection currently in use on this portion of track, yardmaster control and block signal system. According to information received from locomotive engineers operating over the effected territory, the yardmasters that direct traffic on this length of track are overworked (undermanned). They have indicated there have been numerous occasions when employees have corrected yardmaster instructions issued for trains creating overlapping authorities.
- According to locomotive engineer reports, the CN-IC does not accommodate unqualified locomotive engineer's requests for pilots. On May 18, 2004, the engineer on Engine UP 2487 was directed by the yardmaster to proceed up the Y&MV Main Track. The engineer was told to proceed using his conductor as a pilot. It is alleged the engineer went without a territory qualified locomotive engineer pilot as instructed because he did not want to be accused of insubordination.

- It is reported that trains from other railroads use this length of track several times a day, many of them requesting pilots and are denied.
- It is reported that a train crew was stopped at the signal enroute to Presidents Island. While there, under the authority of the yardmaster, they were given permission to enter signaled track to South Yard JCT. The train stopped to clear Main One, while the brakeman was walking to line the switch for the two-minute wait as required in ABS system, a Union Pacific (UP) train came around the curve on the occupied single track. If the train had not stopped in the clear or had the brakeman already lined the switch, there would have been a serious accident. The engineer of the UP Train had been denied a pilot. The layout of these tracks, with the presence of the signal system and accompanying rules, stopped this accident from occurring. This is just one example of the safety benefit of the signal system, and if removed would create a more dangerous situation.
- According to reports from locomotive engineers operating on this territory these incidents occur frequently.

The existing workload for the yardmaster and the effectiveness of the signal system are sufficient reasons to deny this request for discontinuance. Therefore, the BLET requests the waiver be denied.

Sincerely,



Raymond A. Holmes, Vice President and  
National Legislative Representative

cc: Mr. Leon Winn, Manager, Signals & Communications,  
2921 Hornlake Road,  
Memphis, Tennessee 38109  
John Koonce, GC/ICG

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